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BY ECF

Nicole Argentieri
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Assistant United States Attorneys
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Preza, et. al
Docket Number S-4 10 Cr. 147 (SLT)

Dear Government Counsel:

Pursuant to Rule 7 (f) of the Federal Rules of Criminal Procedure and Criminal Rule 16.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, we write to request that the government provide certain information in order to eliminate the need for unnecessary motion practice.

We ask that the government supply the following particulars with respect to the fourth superseding indictment in this matter, filed on February 9, 2012.

Count 1, RA Twelve; Counts 4, 5:

1. Identify Joe Doe #2. We have received no discovery regarding this charge. We understand that John Doe #2 is Anthony Russo. Please confirm.
2. Identify the "commercial business" referred to in these charges.
3. Identify the manner in which Mr. Preza and Mr. Persico allegedly induced Anthony Russo or John Doe #2 to deliver the property at issue.
4. Identify the "others" allegedly involved.

Very truly yours,


JOSEPH R. BENFANTE